

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5

6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :
13 :

14 - HIGHLY CONFIDENTIAL -
15

16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17 - - -
18

19 January 17, 2019
20 - - -
21

22 Videotaped deposition of
23 GABRIEL WEISSMAN, taken pursuant to
24 notice, was held at the law offices of
 Reed Smith, LLP, 1717 Arch Street,
 Philadelphia, Pennsylvania, beginning at
 10:00 a.m., on the above date, before
 Michelle L. Gray, a Registered
 Professional Reporter, Certified
 Shorthand Reporter, Certified Realtime
 Reporter, and Notary Public.

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 GOLKOW LITIGATION SERVICES
 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com

<p style="text-align: right;">Page 82</p> <p>1 form.</p> <p>2 THE WITNESS: I'm not sure.</p> <p>3 BY MS. HUGHES:</p> <p>4 Q. Why would you have put it in</p> <p>5 there?</p> <p>6 A. I'm not sure why I would</p> <p>7 have written that when drafting this.</p> <p>8 Q. Did you --</p> <p>9 MS. McCLURE: Are you</p> <p>10 finished with that document?</p> <p>11 MS. HUGHES: Yes.</p> <p>12 MS. McCLURE: Okay. Is</p> <p>13 there a time when we can take a</p> <p>14 break?</p> <p>15 MS. HUGHES: Yeah. Let me</p> <p>16 just ask a couple more questions,</p> <p>17 and we'll take a break.</p> <p>18 BY MS. HUGHES:</p> <p>19 Q. All right. You can put that</p> <p>20 document to the side.</p> <p>21 Did you draft other press</p> <p>22 releases for Bob Mauch's signature in the</p> <p>23 context of the opioid crisis?</p> <p>24 A. I don't believe I drafted</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Were they both related to</p> <p>2 opioids?</p> <p>3 A. The pieces that I'm thinking</p> <p>4 about right now were, yes.</p> <p>5 Q. Do you remember the</p> <p>6 substantive -- the substance of those</p> <p>7 pieces?</p> <p>8 A. I don't remember the full</p> <p>9 substance off the top of my head.</p> <p>10 MS. HUGHES: All right. We</p> <p>11 can take a break.</p> <p>12 THE VIDEOGRAPHER: Going off</p> <p>13 the record at 11:11 a.m.</p> <p>14 (Short break.)</p> <p>15 THE VIDEOGRAPHER: We are</p> <p>16 back on the record at 11:34.</p> <p>17 BY MS. HUGHES:</p> <p>18 Q. Mr. Weissman, I know we took</p> <p>19 a quick break. Do you still understand</p> <p>20 that you're under oath?</p> <p>21 A. I do.</p> <p>22 Q. So we had been previously</p> <p>23 talking about, you said that you had done</p> <p>24 an op-ed piece for your own byline,</p>
<p style="text-align: right;">Page 83</p> <p>1 press releases for Bob Mauch's signature.</p> <p>2 Q. What about opinion pieces?</p> <p>3 A. I'm not sure if I've drafted</p> <p>4 other ones.</p> <p>5 Q. Have you drafted opinion</p> <p>6 pieces for other AmerisourceBergen</p> <p>7 executives or associates related to the</p> <p>8 opioid crisis?</p> <p>9 A. I've participated in the</p> <p>10 drafting of opinion pieces.</p> <p>11 Q. Do you remember what those</p> <p>12 are?</p> <p>13 A. Yes. I remember -- I</p> <p>14 remember some, yeah.</p> <p>15 Q. What are those?</p> <p>16 A. I participated in the</p> <p>17 drafting of an opinion piece under my own</p> <p>18 byline, and I participated in the</p> <p>19 drafting of an opinion piece under Steve</p> <p>20 Collis' byline as well.</p> <p>21 Q. Do you remember what the</p> <p>22 names of those opinion pieces were?</p> <p>23 A. I don't remember the names</p> <p>24 off the top of my head.</p>	<p style="text-align: right;">Page 85</p> <p>1 right? Is that the correct terminology?</p> <p>2 A. Yes.</p> <p>3 Q. Did that piece run in the</p> <p>4 Cincinnati Inquirer? Do you know?</p> <p>5 A. I believe it did.</p> <p>6 (Document marked for</p> <p>7 identification as Exhibit</p> <p>8 ABDC-Weissman-3.)</p> <p>9 BY MS. HUGHES:</p> <p>10 Q. All right. Mr. Weissman,</p> <p>11 I'm handing you what's being marked as</p> <p>12 Exhibit 3, the Bates stamp is</p> <p>13 HDA_MDL_000013885. This is a document</p> <p>14 that we got permission for from HDA</p> <p>15 counsel.</p> <p>16 A. Thank you.</p> <p>17 Q. If you'll just let me know</p> <p>18 when you're done reviewing that.</p> <p>19 A. Thanks.</p> <p>20 Okay. Thank you.</p> <p>21 Q. Mr. Weissman, if you'll look</p> <p>22 at Page 2 of this e-mail, last Bates</p> <p>23 numbers are 86. You'll see two-thirds of</p> <p>24 the way through on August 22nd, 2017,</p>